

# 15th Annual International Anti-Money Laundering Conference

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# **BANKS FORWARDING REMITTANCES TO CUBA**

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# THE OBAMA POLITICS

- Less emphasis on anti-Communism; more emphasis on human rights, freedom of the press, etc.
- U.S. sanctions program repudiated in the U.N. and other fora.
- Almost every other government in the hemisphere has diplomatic and economic relations with Cuba.
- Until now, relations governed by the internal U.S. policies of the Cold War.

# PUBLIC OPINION

- 2008 Zogby Survey: over 60% of the 111<sup>th</sup> Congress favor lifting the travel and commercial embargos on Cuba.
- FIU Survey: 55% of Miami-Dade's Cuban-Americans favor lifting the embargo.
- Brookings Institute 2008 Recommendations:
  - Lift restrictions on travel, remittances and communications.
  - Remove Cuba from the State Department's List of State Sponsors of Terrorism; restore diplomatic relations.
  - Institute incentives to establish cultural, sport, scientific interchanges and trade relations.
- Survey in Cuba: approximately 2/3 of the Cuban population is of African descent; particularly supportive of President Obama.

# NEW PRESIDENT, NEW POLICY

- Candidate Barack Obama promised Cuban-Americans that he would eliminate restrictions on travel to Cuba and the maximum amounts that could be remitted to family members.
- March 11, 2009: 2004 family travel restrictions eased.
- April 13, 2009: President's Memo to Congress

# NEW PRESIDENT, NEW POLICY

- April 17-19, 2009: 5th Summit of the Americas in Trinidad-Tobago: Obama extended his hand to Cuba – making it more difficult for the Castro brothers to blame the U.S. for their problems.

# IMPACT OF REMITTANCES TO CUBA

- Little data from the Cuban Central Bank (Anuario Estadístico de Cuba - AEC). Statistics could include other monetary transfers, revenues from dollar stores, activity in the State-run money exchange agencies (CADECA).
- Nobody knows the amount of cash savings “under the mattress”

# IMPACT OF REMITTANCES TO CUBA

- Report of the Economic Commission for Latin America and the Caribbean (ECLAC) to the U.N.:
  - Remittances from U.S. residents to Cuba = \$900 million in 2003
  - Believed to exceed \$1 billion today

# Text: WHITE HOUSE MEMO

## April 13, 2009

**PRESIDENT OBAMA'S MEMORANDUM FOR THE SECRETARY OF STATE, THE SECRETARY OF THE TREASURY, THE SECRETARY OF COMMERCE**

**SUBJECT: Promoting Democracy and Human Rights in Cuba**

The promotion of democracy and human rights in Cuba is in the national interest of the United States and is a key component of this Nation's foreign policy in the Americas. Measures that decrease dependency of the Cuban people on the Castro regime and that promote contacts between Cuban-Americans and their relatives in Cuba are means to encourage positive change in Cuba. The United States can pursue these goals by facilitating greater contact between separated family members in the United States and Cuba and increasing the flow of remittances and information to the Cuban people.

To pursue those ends, I direct the Secretary of the Treasury and the Secretary of Commerce, in consultation with the Secretary of State, to take such actions as necessary to:

(a) Lift restrictions on travel-related transactions for visits to a person's family member who is a national of Cuba by authorizing such transactions by a general license that shall:

- Define family members who may be visited to be persons within three degrees of family relationship (e.g., second cousins) and to allow individuals who share a common dwelling as a family with an authorized traveler to accompany them;
- Remove limitations on the frequency of visits;
- Remove limitations on the duration of a visit;
- Authorize expenditure amounts that are the same as non-family travel; and
- Remove the 44-pound limitation on accompanied baggage.

**(b) Remove restrictions on remittances to a person's family member in Cuba by:**

- **Authorizing remittances to individuals within three degrees of family relationship (e.g., second cousins) provided that no remittances shall be authorized to currently prohibited members of the Government of Cuba or currently prohibited members of the Cuban Communist Party;**
- **Removing limits on frequency of remittances;**
- **Removing limits on the amount of remittances;**
- **Authorizing travelers to carry up to \$3,000 in remittances; and**
- **Establishing general license for banks and other depository institutions to forward remittances. ...**

# Cuban Assets Control Regulation

## 31 C.F.R. Part 515 – **JULY 13, 2009**

- U.S. citizens over 18 years old can remit funds to **3<sup>rd</sup> degree** family members (2<sup>nd</sup> cousins)
- **Any amount, any time** (not \$300/3 months)
- “**Depository institutions**” may transmit remittances to Cuba under a **general license**
- -- New list of Money Service Businesses (MSBs) authorized to transmit remittances

# DEFINITION

## – 31 C.F.R. Part 515

- **515.333 Depository institution.**
- The term *depository institution* means any of the following:
  - (a) An insured bank as defined in section 3 of the Federal Deposit Insurance Act;
  - (b) An insured institution as defined in section 408(a) of the National Housing Act;
  - (c) An insured credit union as defined in section 101 of the Federal Credit Union Act; or
  - (d) Any other institution that is carrying on banking activities pursuant to a charter from a Federal or state banking authority.

Sept. 3, 2009 –

# OFAC Press Release

## TEXT

- The Cuban Assets Control Regulations, 31 CFR part 515 (“CACR”), were issued by the U.S. Government on July 8, 1963, under the Trading With the Enemy Act (50 U.S.C. App. 5 et seq.).
- On 9/3/09, the U.S. Office of Foreign Assets Control (OFAC) amended the CACR to implement measures announced by the President on April 13, 2009, to promote **greater contact between separated family members** in the United States and Cuba and to **increase the flow of remittances and information** to the Cuban people.
- OFAC also is amending the CACR to implement certain provisions of the Omnibus Appropriations Act, 2009 (Pub. L. 111-8, 123 Stat. 524) (“Appropriations Act”), as well as to make certain technical and conforming changes.
- (No change in the 47-year economic embargo.)

# Text of OFAC Press Release (cont'd) 9/3/09

- **Remittances.** OFAC has eased restrictions on remittances (including from inherited blocked accounts) to "close relatives" who are nationals of Cuba by issuing a general license.
- Persons subject to the jurisdiction of the United States may send remittances to "close relatives" (including aunts, uncles, cousins, and second cousins) who are nationals of Cuba. These amendments do *not* affect the prohibition on remittances to a "prohibited official of the Government of Cuba" or a "prohibited member of the Cuban Communist Party," as defined in the CACR.
- There is **no limit on the amount** of such a remittance.
- There is no limit on the **frequency** with which persons subject to the jurisdiction of the United States may send such remittances.
- Authorized family travelers may carry up to \$3,000 of such remittances to Cuba.
- Remittances for emigration-related purposes continue to be subject to separate restrictions.

# “Prohibited Officials” Include:

- Ministers, Vice-ministers, members of the State Councils and Ministries
- Members and employees of the National Assembly (Asamblea Nacional del Poder del Pueblo) and of any provincial assembly
- Local heads of Committees for the Defense of the Revolution
- Director Generals and sub-Director Generals and higher rank at all ministries and state agencies.
- Employees of the Ministry of the Interior (MININT)
- Employees of the Ministry of Defense (MINFAR)
- Secretaries y first Secretaries de the Confederation of Workers of Cuba (CTC) y its member unions
- Editors y heads of state communications organizations (radio, TV, press)
- Members and employees of the National Supreme Tribunal
- Members of the Cuban Communist Party, including members of the Politburo, Central Committee, officials and Secretaries of the provincial committees.

# Press Release 9/3/09: Remittances from Depository Institutions

- depository institutions are permitted to set up testing arrangements and exchange authenticator keys with **Cuban financial institutions.**
- depository institutions **may not, however, open or use direct correspondent accounts** with Cuban financial institutions.

# BOTTOM LINE

A U.S. citizen in Miami can now go to his bank and transfer money to the account of his second cousin in Havana.

The cousin goes to his bank and withdraws the money.

Delays?

Taxes?

Fees?

# OFAC Circular 2006

- Describes Service Provider Program
- Guidelines in 5 Appendices:
  - I – Application
  - II - Operational
  - III – Screening
  - IV – Recordkeeping and Reporting
  - V - Enforcement

# CIRCULAR 2006

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# Requirements for All Service Providers

## - Circular 2006 -

### I. Application Requirements

OFAC requires that when you apply to be a Travel Service Provider (“TSP”), Carrier Service Provider (“CSP”), and/or a **Remittance Forwarder (“RF”)** (either singularly or collectively “SP”), you identify yourself in writing, name the type of authorization you seek, and state how you would comply with the Cuban Assets Control Regulations, 31 C.F.R. Part 515 (the “Regulations”). The application requirements that follow generally confirm with the requirements in § 515.572 of the Regulations.

# APPENDIX I - Remittance Forwarder Application Requirements

- A. **Complete and Accurate Data**
- B. **Written Affirmation of Non-Discrimination**
- C. **Corporate Information**
- C. **Personal Information**

OFAC bases its determination to grant an authorization on the information provided in the application and other representations made by you or on your behalf, as well as other relevant information. If you willfully make or cause to be made in any application filed with OFAC any statement that was, at the time and in light of the circumstances under which it was made, false or misleading or omit in any application any material fact that was required, this is a sufficient ground to justify suspension or revocation of your authorization at any later time. It may also be the grounds for declaring your authorization void from the date of issuance, and may result in criminal or civil penalties.

# APPENDIX I (continued)

## 2. Background Investigation

Full federal, state, and local law enforcement background investigation of each owner, significant shareholder, director, and manager directly involved in decisions related to Cuba transactions prior to granting authorization.

## 3. Record of Certain Conduct

Conviction at any time after filing an application for a license is a sufficient ground to deny the application if the conviction is for any felony or misdemeanor that:

- involved the importation, exportation, or transfer of property in violation of any law or regulation administered by OFAC,
- arose directly out of the conduct of the business covered by the license, or
- involved larceny, extortion, forgery, counterfeiting, fraudulent concealment, embezzlement, fraudulent conversion, misappropriation of funds, or a violation of export or import control laws or banking laws. OFAC in its discretion may decline to grant a license based on other law violations.

# APPENDIX I (continued)

## 4. Control and Responsibility

In applying to OFAC to become an SP, you agree to assume control over and be responsible for any action or transaction in which you engage, personally or as a corporate entity, or which is engaged in on your behalf or for your benefit. OFAC will hold you accountable for the conduct of any agent and any such conduct.

OFAC presumes that any action taken by your agent who is subject to your control constitutes an action for which you are responsible.

OFAC will conduct a full federal, state, and local law enforcement background investigation of each owner, significant shareholder, director, and manager of an applicant and its agents prior to granting authorization.

# APPLICANT AFFIDAVIT

## B. Scope of Your RF Operation

1. For a person seeking to **work through (an) agent(s)**, describe how the transactions conducted by your agent(s): (i) are clearly identified for the client as yours and not the agent's; (ii) are subject to your review, cancellation, and control for the purposes of the SP Program; and (iii) are ultimately your responsibility – you are liable for the transactions conducted through your agent(s).
2. For a depository institution seeking authorization to act as a Remittance Forwarder, you must identify under what Federal bank regulator you are subject to supervision and examination. Identify your principal point of contact at the Federal bank regulator and provide a phone number for that contact. Depository institutions should contact OFAC-Miami by phone as part of the application process.

- C. RF Form and Procedures You must certify the following: “In making application to receive authorization as an RF, I have read and understood and will comply with and implement the procedural and substantive rules described in the Circular, including the

# APPENDIX II - CIRCULAR 2006

## OPERATIONAL GUIDELINES

The Regulations prohibit the unauthorized transfer of funds to Cuba or to a national of Cuba. You may transfer funds to Cuba or to a national of Cuba under OFAC authorization in the following circumstances:

### A. Remittances Authorized by General or Specific License

#### 1. Family Household Remittances

A person 18 years old or older is authorized under general license to send periodic family household remittances to Cuba subject to limitations on amount, frequency, and the recipient's identity. **These remittances may not be sent to listed prohibited officials of the Cuban Government and to listed prohibited members of the Cuban Communist Party. See SP Screening Guidelines (Appendix III). These remittances also may be sent from certain inherited blocked funds of the payee located in U.S. bank accounts.**

#### 2. Emigration Remittances

Persons subject to U.S. jurisdiction may send up to \$1,000 per payee on a one-time basis as an

"emigration-related" remittance to any Cuban nationals to enable the payees to emigrate from

Cuba to the United States. Of this \$1,000, up to \$500 may be remitted to a Cuban national prior

to the payee's receipt of a valid U.S. visa or other U.S. immigration document. The remaining

# Appendix II (continued)

## 3. Other Remittances

OFAC may authorize other remittances to Cuba or to nationals of Cuba in appropriate circumstances by **specific license** on a case-by-case basis, including remittances to nongovernmental organizations, pro-democracy groups, independent civil society groups, and religious organizations, as well as to individual members of such organizations.

### B. Remittance Forwarder Authorized Services

#### 1. Forwarding Remittances

You may receive monies in which Cuba has an interest in the United States from your own retail operations. You may engage in such transactions directly only with a client who is authorized by general license or possesses a specific license to remit an amount to Cuba or a Cuban national. Prior to receiving such a remittance, you must ensure that the client is authorized to remit funds and the proposed remittance satisfies any applicable dollar value and frequency limitations in the Regulations or the remitter's specific license. See the SP Screening Guidelines (Appendix III).

#### 2. Transferring Authorized Funds Between RFs

In addition to receiving remittances from your own clients, you may receive or transfer monies in the United States in which Cuba has an interest from or to another RF. In engaging in such transactions you must ensure that all persons in the United States involved in the transfer of the remittance are RFs. Prior to receiving any such transfer, you must record the identity of the transferring RF and have no reason to believe that either the remitter or remittance is not authorized under an OFAC general or specific license.

# Appendix II (continued)

## 3. International Transfer of Funds

You may transfer authorized funds in which Cuba or a Cuban national has an interest provided the following terms and conditions are satisfied:

- You must transfer those funds to an identified account in a **third-country bank**;
- You must ensure that any remittance is delivered to the intended recipient in Cuba in any of the following five currencies: **US dollars, Canadian dollars, Swiss francs, British pounds, or euros**;
- You must ensure that any remittance is delivered to the intended recipient in Cuba in a timely fashion;
- You **must ensure that any remittance is delivered to the intended recipient in Cuba with no fee charged to the Cuban recipient**; and
- You must ensure that the transfer is done consistent with the method of transfer described to OFAC in your RF application.

# Foreign Banks in Cuba

Bank name	Country of domicile
<a href="#"><u>Banco Bilbao Vizcaya Argentina</u></a>	<a href="#"><u>Spain</u></a>
<a href="#"><u>Banco Nacional de Comercio Exterior</u></a>	<a href="#"><u>Mexico</u></a>
<a href="#"><u>Banco Sabadell</u></a>	<a href="#"><u>Spain</u></a>
<a href="#"><u>BNP Paribas</u></a>	<a href="#"><u>France</u></a>
<a href="#"><u>Caja de Ahorros y Monte de Piedad de Madrid</u></a>	<a href="#"><u>Spain</u></a>
<a href="#"><u>EBN Probanca</u></a>	<a href="#"><u>Spain</u></a>
<a href="#"><u>Fransabank</u></a>	<a href="#"><u>Lebanon</u></a>
<a href="#"><u>Havana International Bank</u></a>	<a href="#"><u>United Kingdom</u></a>
<a href="#"><u>ING Bank</u></a>	<a href="#"><u>Netherlands</u></a>
<a href="#"><u>National Bank of Canada</u></a>	<a href="#"><u>Canada</u></a>
<a href="#"><u>Netherlands Caribbean Bank</u></a>	<a href="#"><u>Netherlands Antilles</u></a>
<a href="#"><u>Republic Bank</u></a>	<a href="#"><u>Trinidad and Tobago</u></a>
<a href="#"><u>Société Générale</u></a>	<a href="#"><u>France</u></a>

# Appendix II (continued)

## C. Types of Remittance Forwarders

### 1. Remittance Forwarders

An RF, as described in § 515.572(a)(3) of the Regulations, **may forward authorized remittances to Cuba or a Cuban national on behalf of authorized remitters.** An RF may choose further to request to be a National Remittance Forwarder or it **may be a U.S. Depository Institution,** as described below.

### 2. National Remittance Forwarders

As a matter of policy, OFAC has determined that an RF that has the resources and interest in providing services from multiple agents in distant locations may qualify as a “National Remittance Forwarder” (“NRF”). An entity qualifying as a NRF may operate from any location in the U.S.

# Appendix II (continued)

An NRF must have actual control over and direct responsibility for the regulated transactions and conduct of any forwarding agent acting on its behalf or for its benefit, including the power to cancel any unauthorized transaction. Further, the NRF must have appropriate record keeping and reporting procedures, including central storage of the comprehensive records kept for all transactions/conduct by all NRF agents.

When OFAC authorizes an NRF, this covers not just the NRF's own employees, but also all agents acting on its behalf. Those entities that have qualified to date as NRFs have demonstrated a strong structure of central control inherent in the businesses that they were already operating.

For the benefit of the public, an NRF agent must clearly identify itself through appropriate signage, business forms, phone salutations, as an authorized agent of the NRF. This avoids any possible confusion to clients as to the entity with which it is conducting the transactions.

# Appendix II (continued)

## C.3. U.S. Depository Institutions

- U.S. depository institutions, as defined in § 515.333 of the Regulations (“Depository Institutions”), [UNDER CERTAIN CIRCUMSTANCES] **must be specifically licensed as RFs to assist individual clients that seek to remit funds intended for Cuba or a Cuban national. Depository Institutions need not be RFs in order to assist RFs in transferring funds internationally that are intended for Cuba or a Cuban national.**

# Remittance Forwarder (RF) Form

The depository institution must certify the following:

- *“In making application to receive authorization as an RF, I have read and understood and will comply with and implement the procedural and substantive rules described in Circular 2006, including the Appendices.”*

# APPENDIX III - SERVICE PROVIDER SCREENING GUIDELINES

## I. Service Providers Must Screen Their Potential Clients

As a Service Provider, you must screen each potential client to ensure that the client's proposed

transactions are authorized by OFAC or otherwise permissible. The details of how to screen varies by type of authorization.

For each client, you must screen the potential client and the client's proposed transaction by satisfying yourself that you know the following through discussions with the potential client and a review of the potential client's documentation:

- the identity of the client;
- the authorization that the client claimed and supporting documents;
- the proposed transactions the client asked to engage in; and
- your conclusion that to arrange the travel-related transactions is consistent with your authorization.

Note that if a client states he or she is traveling pursuant to an OFAC specific license, but demonstrates an intent merely to visit tourist destinations or engage in other activities not authorized by that license, your assisting that person may be the basis for OFAC action against you pursuant to the SP Enforcement Guidelines. For example, you may not assist a client who claims to be traveling pursuant to a religious organization's license but who gives you reason to believe that he or she in fact will be traveling to visit family in Cuba.

# Appendix III (continued)

## 1. Generally Licensed Remittances

The Regulations provide general licenses authorizing certain remittances to nationals of Cuba subject to restrictions on the recipients, dollar amount, and frequency. These general licenses and their **restrictions are set forth in the Regulations and in the Cuba Remittance Affidavit (OMB 1505-0167)**. A copy of the affidavit is included in **Appendix IV** of this Circular. You must have the client complete the Cuban Remittance Affidavit. Be sure that the client signs and dates the affidavit. Only then may you proceed to transfer the remittance. You must give the customer a copy of the completed affidavit for his or her records. **The Service Provider must also keep a copy of each affidavit for its records.**

## 2. Specifically Licensed Remittances

OFAC may issue a specific license authorizing the transfer of remittances not covered by any general license. Before processing a client's request to transfer funds to Cuba pursuant to a specific license, you must **obtain a copy of the specific license that has been issued by OFAC** and confirm that **the license authorizes the client to send the proposed remittance.**

# Appendix III (continued)

## II. Service Providers Must Screen other Service Providers

### A. Documentation of Other Service Providers' Authorization

If you wish to have an individual or entity subject to U.S. jurisdiction assist in the licensed services you provide, or if another individual or entity subject to U.S. jurisdiction seeks to engage in a regulated transaction with you, you must first confirm that the individual or entity is an authorized SP by checking the List of Authorized Travel, Carrier, and Remittance Forwarding Service Providers publicly available on OFAC's website. If you have any questions concerning the authorization of another individual or entity as an SP, the SP should seek guidance from OFAC.

### B. Business Practices Relating to Other Service Providers

You must engage in business practices that reasonably help prevent people from mistakenly dealing with unauthorized persons or from unauthorized locations. For example, you must not send information about availability of seats on a charter flight to Cuba to addresses, fax numbers, or e-mail addresses other than those of authorized SPs and authorized locations. Failure to observe such business practices may form a basis for an enforcement action pursuant to the SP Enforcement Guidelines (Appendix V).

### C. Location-Specific Authorization

When OFAC authorizes you, it identifies the office locations where you may operate. The requirement that you screen other SPs is also location-specific. Hence, you must be certain that other SPs with whom you may be doing business are operating only from OFAC-authorized locations.

# Appendix IV

## Record Keeping and Reporting

### I. Service Providers Must Keep Records and Report

#### A. Recordkeeping

##### 1. For all Service Providers

- Compile reports on each transaction (relevant parties, reasons for acting, etc.)
- File with OFAC an annual report of transactions
- The SP must keep records of its regulated transactions and its conduct concerning Cuba for five years

# Appendix IV (continued)

- The RF shall ensure that the client completes, signs, and dates a copy of the Cuban Remittance Affidavit (OMB 1505-0167)
- The client should receive a copy for the client's records.
- The RF shall inform the client that the client must **keep a record of the transaction for five years.**

# Appendix V – Enforcement Guidelines

Administrative actions, including licensing, provisional authorization, oversight and review, suspension and/or revocation of authorization, monetary penalties, and referral of certain cases to the Department of Justice for criminal prosecution are intended to further foreign policy goals.

These SP Enforcement Guidelines list a series of administrative actions OFAC may take once OFAC has reason to believe, based on relevant information, that the SP Program requirements may not be satisfied. Some of the administrative actions are remedial in nature.

Where OFAC believes that the discrepancy is due to intentional and knowing action or a great degree of negligence, more significant enforcement actions may be taken. Repeated instances of violations will result in more serious administrative responses: cautionary letter, warning letter, cease and desist order, monetary penalty, suspension or revocation, criminal referral, etc.

# AUTHORIZED SERVICE PROVIDERS

[http://www.treas.gov/offices/enforcement/ofac/programs/cuba/cuba\\_tsp.pdf](http://www.treas.gov/offices/enforcement/ofac/programs/cuba/cuba_tsp.pdf)

- OFAC authorized certain Service Providers under a specific license on **July 13, 2009**. The legend notes the services they are authorized for:

## **Legend:**

- CSP: Carrier Service Provider
- TSP: Travel Service Provider
- RF: Remittance Forwarder

# MSBs Authorized to Send Remittances to Cuba – July 13,2009 - EXAMPLES:

**A Mi Cuba Travel Express, Corp.**

TSP, **RF** (305) 447-0886

Mr. Juan C. Martinez

4874 NW 7 Street

Miami, FLOFICINA DE OFAC EN MIAMI:

(786) 845-2828

Línea Confidencial Violaciones al

Embargo de Cuba

(786) 845-2829

**Agencia 12 y 23, Inc.**

TSP, **RF** (813) 414-9510

Mr. Jose E. Mendoza

5027 N Lois Avenue

Tampa, FL 33614

# List (continued)

**Agencia Via Cuba**

Ms. Estrella Santos  
3009 E Florence Avenue  
Huntington Park, CA 90255

TSP, **RF** (323) 587-0611

**Americuba, Inc.**

Mr. Jose Luis Cabrera  
2116 Palm Avenue  
Hialeah, FL 33010

TSP, **RF** (305) 882-0007

**Arenas Blancas International Services Corp.** TSP, **RF** (305) 265-7117

Ms. Asela Prado  
7276 SW 8 Street  
Miami, FL 33144

**El Avileño Export & Import, Inc.**

Ms. Veronica Sanchez  
5784 W Flagler Street  
Miami, FL 33144

TSP, **RF** (305) 267-1255

# List (continued)

## **Agencia Cristiana**

TSP, **RF** (305) 883-7351

*Incorporated as Religious & Family Travel Services, Inc.*

Mr. Levy Montes de Oca

380 E 9 Street, # 5 5888-A W 20 Avenue 3185 W 76 Street, # 3 13677 SW 26  
Street

Hialeah, FL 33010 Hialeah, FL 33016 Hialeah, FL 33018 Miami, FL 33175

89 55 St. Regis Lane 9364 SW 56 Street 4068 W 12 Avenue

Port Richey, FL 34668 Miami, FL 33165 Hialeah, FL 33012

## **Alas Travel C.U.B.A., Corp.**

TSP, **RF** (305) 821-5660

Mr. Jose E. Fernandez

1248 W 68 Street 222 Industrial Blvd., # 129

Hialeah, FL 33014 Naples, FL 34104

## **Alfredo Rodriguez**

TSP, **RF** (305) 305-4926

Mr. Alfredo Rodriguez

7085 W 4 Avenue

Hialeah, FL

**ETC., ETC**

# FYI

**OFAC MIAMI:  
845-2828**

**(786)**

List of Remittance Forwarders (other than depository institutions, which are authorized under general license), Travel Service Providers, and Carrier Service Providers:

[http://www.treas.gov/offices/enforcement/ofac/programs/cuba/cuba\\_tsp.pdf](http://www.treas.gov/offices/enforcement/ofac/programs/cuba/cuba_tsp.pdf)

Download Application to Visit Family Members:

<https://fafrequest.ofac.treas.gov>

For Depository institutions:

Confidential Line to Report Sanction Violations: (786) 845-2829

*Thank You*

**Dr. Marilyn Bruno, Ph.D., J.D.**

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